

Friday, March 14, 2025 at 16:42:41 Eastern Daylight Time

**Subject:** Re: Fox News/Delancey: Discovery Responses  
**Date:** Wednesday, August 7, 2024 at 2:13:29 PM Eastern Daylight Time  
**From:** Alfredo J Pelicci  
**To:** Katzenstein, Krissy, Kimberly A. Catala  
**CC:** Evans, Paul, Jason Sunshine, Bryan Freedman, Summer Benson  
**Attachments:** image004.png, image005.png, image001.png, image002.png, image003.png, image006.png, image007.png, image008.png, image009.jpg, AEK Krause Model Confidentiality and Protective Order-2.pdf

Krissy,

We are not agreeing to this broad confidentiality order. We can agree to something more aligned with the model orders we see in SDNY. Please find one attached. Feel free to make minor revisions to it.

Nevertheless, we did not agree that productions would be withheld until such order is entered. Tellingly, Fox is the only party that has done this. We will agree to hold all documents confidential until the order is ironed out and entered – enabling Fox to promptly produce. This must be immediately remedied or we will seek Court intervention. We are confident that the Court would see this as improper dilatory tactic.

Please let me know your availability for a meet and confer on Friday, Monday, or Tuesday.

Regards,





**FILIPPATOS PLLC**  
 Employment Law, Litigation & ADR

**Alfredo Pelicci**  
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**From:** Katzenstein, Krissy <[Krissy.Katzenstein@bakermckenzie.com](mailto:Krissy.Katzenstein@bakermckenzie.com)>  
**Date:** Monday, July 29, 2024 at 7:59 AM  
**To:** Alfredo J Pelicci <[Apelicci@filippatoslaw.com](mailto:Apelicci@filippatoslaw.com)>, Kimberly A. Catala <[kcatala@filippatoslaw.com](mailto:kcatala@filippatoslaw.com)>  
**Cc:** Evans, Paul <[Paul.Evans@bakermckenzie.com](mailto:Paul.Evans@bakermckenzie.com)>, Jason Sunshine <[jsunshine@ftllp.com](mailto:jsunshine@ftllp.com)>, Bryan Freedman <[bfreedman@ftllp.com](mailto:bfreedman@ftllp.com)>, Summer Benson <[sbenson@ftllp.com](mailto:sbenson@ftllp.com)>  
**Subject:** RE: Fox News/Delancey: Discovery Responses

Alfredo,

No confidentiality stipulation has been entered in this matter. We have attached a draft for your and Mr. Wells' review. Please advise of any proposed revisions. Once entered, we will make our production.

Thank you,  
 Krissy

**Krissy Katzenstein**  
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**Baker  
 McKenzie.**

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**From:** Alfredo J Pelicci <[Apelicci@filippatoslaw.com](mailto:Apelicci@filippatoslaw.com)>  
**Sent:** Thursday, July 25, 2024 3:01 PM  
**To:** Katzenstein, Krissy <[Krissy.Katzenstein@bakermckenzie.com](mailto:Krissy.Katzenstein@bakermckenzie.com)>; Kimberly A. Catala <[kcatala@filippatoslaw.com](mailto:kcatala@filippatoslaw.com)>  
**Cc:** Evans, Paul <[Paul.Evans@bakermckenzie.com](mailto:Paul.Evans@bakermckenzie.com)>; Jason Sunshine <[jsunshine@ftllp.com](mailto:jsunshine@ftllp.com)>; Bryan Freedman <[bfreedman@ftllp.com](mailto:bfreedman@ftllp.com)>; Summer Benson <[sbenson@ftllp.com](mailto:sbenson@ftllp.com)>  
**Subject:** [EXTERNAL] Re: Fox News/Delancey: Discovery Responses

Hi Krissy,

Correct me if I'm wrong, but we never received a document production from Fox Defendants. We'll be moving to compel on this next week if it is not remedied.

Regards,



FILIPPATOS PLLC  
Employment Law, Litigation & ADR

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**From:** Katzenstein, Krissy <[Krissy.Katzenstein@bakermckenzie.com](mailto:Krissy.Katzenstein@bakermckenzie.com)>

**Date:** Wednesday, July 3, 2024 at 5:01 PM

**To:** Alfredo J Pelicci <[Apelicci@filippatoslaw.com](mailto:Apelicci@filippatoslaw.com)>, Kimberly A Catala <[kcatala@filippatoslaw.com](mailto:kcatala@filippatoslaw.com)>

**Cc:** Evans, Paul <[Paul.Evans@bakermckenzie.com](mailto:Paul.Evans@bakermckenzie.com)>, Jason Sunshine <[jsunshine@ftllp.com](mailto:jsunshine@ftllp.com)>, Bryan Freedman <[bfreedman@ftllp.com](mailto:bfreedman@ftllp.com)>, Summer Benson <[sbenson@ftllp.com](mailto:sbenson@ftllp.com)>

**Subject:** Fox News/Delancey: Discovery Responses

Counsel,

Please see the attached discovery responses.

Thank you,  
Krissy

**Krissy Katzenstein**

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